

# Updated Instructions for the Data Evaluation Project – Submitting Inspection Forms with Monthly Report 5 to the Department of Pesticide Regulation Headquarters

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**Date Established**    January 23, 2003

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**Enclosure to**            Enforcement Letter ENF 03-01

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**Distribution**           County Agricultural Commissioners

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**Referrals**              If you have questions, please contact your Senior Pesticide Use Specialist or Ms. Ada Ann Scott, Data Processing Manager I, at (916) 445-4118.

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**Introduction**          **This letter supercedes the instructions outlined in Enforcement Letters ENF 02-26, ENF 01-44, and ENF 01-07.**

The Department of Pesticide Regulation's (DPR's) strategic plan aims to reduce human and environmental health risks by maximizing compliance through identifying and addressing problems. Specifically, the plan indicates that DPR will compile and analyze compliance information annually.

County agricultural commissioners (CACs) conduct inspection activities that are broader in scope and number relative to the compliance assessment surveys conducted by DPR in the past. These inspection activities, coupled with our overview inspections, provide a more accurate and representative picture of the agricultural industry's compliance with federal, state, and local pesticide regulatory requirements.

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# Updated Instructions for the Data Evaluation Project –

## Submitting Inspection Forms with Monthly Report 5 to the Department of Pesticide Regulation Headquarters, continued

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### Background

Under a pilot project initiated in October 2001, (Enforcement Letters ENF 01-07 and ENF 01-44), DPR began collecting CAC-generated compliance information from two inspection forms voluntarily submitted by counties. The project, deemed the “Data Evaluation Pilot Project,” was undertaken to provide DPR with a means to identify trends and issues relative to compliance with California’s pesticide laws and regulations.

Initially the project dealt with these forms:

- Pesticide Use Monitoring Inspection (PR-ENF-021)
- Field Worker Safety Inspection (PR-ENF-044)

In July 2002, the project was expanded (Enforcement Letter ENF 02-26) to include two additional forms:

- Fumigation Use Monitoring Inspection (PR-ENF-144)
- Pest Control Records Inspection (PR-ENF-022)

DPR and the counties undertook a second pilot project this past year to review and revise the current inspection forms to improve overall quality of inspections. Counties have tested the revised forms to determine workload impacts, as well as their effectiveness in meeting the project goals. The County Agricultural Commissioners and Sealers Association (CACASA) approved general use of these forms beginning in July 2003 by all counties.

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### Submission of All Forms

At the CACASA 2002 Winter Conference, the CACs agreed to submit all inspection forms and that all counties participate in order to achieve an accurate and representative statewide picture of compliance levels. This change became effective January 1, 2003.

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## Updated Instructions for the Data Evaluation Project – Submitting Inspection Forms with Monthly Report 5 to the Department of Pesticide Regulation Headquarters, continued

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### **Project Scope & Implementation January through June 2003**

DPR will collect and analyze CAC-generated compliance information gathered through county inspections. All CACs will submit completed copies of the following forms effective January 2003:

- Pesticide Use Monitoring Inspections, PR-ENF-021;
  - Pest Control Records Inspections, PR-ENF-022;
  - Field Worker Safety Inspections, PR-ENF-044;
  - Fumigation Use Monitoring Inspections, PR-ENF-144
- Structural Pest Control Inspections, PR-ENF-011.

The forms are to be submitted with the Pesticide Regulatory Activities Monthly Report, PR-ENF-099 (Report 5).

During this initial implementation period (2002/03), DPR will return incomplete inspection forms to the counties through their Senior Pesticide Use Specialist (SPUS). This will create a training opportunity between the SPUS and the CAC to review and improve county inspections. DPR will not enter incomplete inspections but will continue to reimburse counties for all inspections conducted during 2002/03.

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### **Revised Forms Pilot Project Counties**

Those 12 counties participating in the pilot project to test and evaluate newly revised inspection forms should continue to submit all their inspection forms and the revised Pesticide Regulatory Activities Monthly Report form as outlined in the pilot project instructions (Enforcement Letter 02-26).

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## Updated Instructions for the Data Evaluation Project –

### Submitting Inspection Forms with Monthly Report 5 to the Department of Pesticide Regulation Headquarters, continued

**Project Scope & Implementation**  
**Fiscal Year**  
**2003/04**

On July 1, 2003, use of the newly revised inspection forms by all counties becomes effective. All CACs will submit completed copies of the following forms effective July 2003:

- Field Worker Safety Inspection, PR-ENF-103
- Pesticide Use Monitoring Inspection, PR-ENF-104
- Field Fumigation Inspection, PR-ENF-105
- Commodity Fumigation Inspection, PR-ENF-106
- Structural Branch 1 Use Monitoring Inspection, PR-ENF-107
- Structural Branch 2 & 3 Use Monitoring Inspection, PR-ENF-108
- Production Agriculture/Other/Dealer/PCA
- Pest Control Records Inspection, PR-ENF-109
- Agriculture/Structural Pest Control Records Inspection, PR-ENF-110

These forms are to be submitted with the revised Pesticide Regulatory Activities Monthly Report, PR-ENF-099 (Report 5).

**Note:** Pesticide Pre-application Site Inspections (PR-ENF-102) will **not** be collected for the data evaluation project.

The inspection procedures manual will be updated to address the revised inspection forms and inspection requirements. DPR will communicate and discuss outstanding issues as they arise.

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**Evaluation  
of Program**

The Data Evaluation Project will run through the end of fiscal year 2003/04. Continuation will be determined prior to the end of that fiscal year. DPR will prepare and distribute quarterly reports to CACs on general compliance rates through this project.

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